

REMARKS

Claims 1-14

Claim 1 is an independent claim, from which claims 2-14 ultimately depend. Claims 1-7 and 11-14 have been rejected under 35 USC 102(e) as being anticipated by Ezumi (7,197,329). Claims 8-10 have been objected to as containing allowable subject matter, but which ultimately depend from a rejected base independent claim, claim 1. Applicant respectfully submits that as originally presented, claim 1 is patentable over Ezumi. Therefore, claims 2-14 are patentable at least because they depend from a patentable base independent claim, claim 1.

Applicant submits that several aspects of claim 1 are not disclosed by Ezumi. Therefore, insofar as Ezumi does not disclose the entirety of the invention as claimed in claim 1, Ezumi does not anticipate claim 1. The standard for anticipation under 35 USC 102 is that every aspect of a claim must identically appear in a single prior art reference for it to anticipate the claim. (In re Bond, 15 USPQ2d 1566 (Fed. Cir. 1990)) "[T]here must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention." (Scripps Clinic & Research Found. v. Genentech, Inc., 18 USPQ2d 1001, 1010 (Fed. Cir. 1991)) Each of the aspects of claim 1 that are not found in Ezumi is now discussed in detail.

(1) Plurality of display modules interlockable to form the display

Claim 1 recites "a plurality of display modules *interlockable* to form the display" of claim 1. Interlockable display modules are display modules that interlock with one another. The online dictionary www.dictionary.com relevantly defines the verb interlock as "to lock one with another, "to fit (parts) together," and "to fit or fasten together." Thus, interlockable display modules are those that lock with one another, and that fit or fasten together, to form the display of claim 1. It is noted that this definition of the term interlockable is consistent with how the term is used throughout the patent application as filed; see, e.g., p. 11, l. 32, through p. 12, l. 9.

The Examiner has identified the display modules of claim 1 in Ezumi as the display 101 of the telephone base station 100 and the display 111 of the cordless telephone handset 110. However, the display 101 and the display 111 are not *interlockable*. That is, the display 101 and the display 111 are not fit or fastened together, or otherwise locked with each other, to form a display. For instance, the telephone base station 100 and the cordless telephone handset 110 encompassing the displays 101 and 111 are not fit or fastened together, or otherwise locked with one another. For at least this reason, then, claim 1 is patentable over Ezumi.

(2) *Each display module comprising at least one connector*

Claim 1 recites that *each* display module comprises “at least one connector” disposed in the display module. The Examiner has identified in Ezumi the wire communication line 130, which connects the telephone base station 100 to a public telephone line (see col. 6, ll. 54-55), as the connector of the telephone base station 100, and thus the connector of the display 101 that corresponds to one of the display modules of claim 1. However, the Examiner has not identified any component in Ezumi that corresponds to the connector of the cordless telephone handset 110, and thus to the connector of the display 111 that corresponds to another of the display modules of claim 1.

Applicant further notes that Ezumi does not disclose the cordless telephone handset 110 having a wire communication line 130 like the telephone base station 100 does. This makes sense, because the purpose of a cordless telephone handset 110 is of course that you do not have to be tethered by a physical wire to make telephone calls. Rather, the idea is that just the telephone base station 100 is physically connected to a public telephone line, and the base station 100 wirelessly communicates with the cordless telephone handset 110. Therefore, in contradistinction to the claimed invention, *each* display module does *not* comprise at least one connector in Ezumi; in particular, the display 111 of the cordless telephone handset 110 does not comprise a connector. For just this reason as well, claim 1 is patentable over Ezumi.

(3) Connector to receive power from and/or provide power to an adjacent display module

Claim 1 recites that each display module comprises at least one connector disposed in the display module, as noted above. Furthermore, the at least one connector is to “at least one of” receive power from and provide power to *a first adjacent display module*. Thus, the connector of a given display module is to receive power from and/or provide power to *another, adjacent display module*. The Examiner has stated that the wire communication line 130 in Ezumi that connects the telephone base station 100 to a public telephone line receives power because “it is inherent that the wired communication line is plugged into a power source.” (Office action, p. 2, para. 2.) While Applicant does not necessarily agree, it is noted that claim 1 does not just recite that the connector of a display module is to receive power and/or to provide power. Rather, claim 1 recites that the connector of a display module is to receive power from and/or provide power to *an adjacent display module*.

However, in Ezumi, the wire communications line 130 does not receive power from and/or provide power to *an adjacent display module*, in contradistinction to claim 1. Rather, the wire communications line 130 connects telephone base station 100, including the display 101, to a public telephone line, and not to the other display module in Ezumi, the cordless telephone handset 110 including the display 111. Therefore, the identified connector of the telephone base station 100 including the display 101 in Ezumi that corresponds to a display module of claim 1 does not receive power from or provide power to the cordless telephone handset 110 including the display 111 that corresponds to another display module of claim 1, in contradistinction to claim 1. For just this reason, too, claim 1 is patentable over Ezumi.

(4) Receptor receptive to a connector of a second adjacent display module

Claim 1 recites that each display module comprises at least one receptor disposed in the display module and receptive to a connector of a second adjacent display module. The Examiner

has identified in Ezumi the wireless antenna 113 as the receptor of one display module, namely the cordless telephone handset 110 including the display 111. Furthermore, as noted above, the Examiner has identified in Ezumi wire communications line 130 as the connector of another display module, namely the telephone base station 100 including the display 101.

However, in Ezumi, the wireless antenna 113 is not “receptive” to the *connector* of a second adjacent display module, in contradistinction to claim 1. Rather, the wireless antenna 113 of the cordless telephone handset 110 including the display 111 is at best receptive to communication with the wireless antenna 104 of the telephone base station 100 including the display 101, and *not* to the connector of the base station 100, which is the wire communications line 130. Therefore, the identified receptor of the cordless telephone handset 110 including the display 111 in Ezumi that corresponds to a display module of claim 1 is not receptive to a *connector* of a second adjacent display module (the telephone base station 100), but rather is receptive to a *receptor* of this second adjacent display module, in contradistinction to claim 1. For just this reason as well, claim 1 is patentable over Ezumi.

Claims 15-19

Claims 15-19 have been allowed, for which Applicant thanks the Examiner.

Claims 20-26

Claim 20 is an independent claim, from which claims 21-26 ultimately depend. Claims 20-26 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi in view of Asano (6,636,181). Applicant submits that as originally presented, claim 20 is patentable over Ezumi in view of Asano. Therefore, claims 21-26 are patentable at least because they depend from a patentable base independent claim, claim 20.

Applicant notes that a claimed invention has to be considered “as a whole” (MPEP sec. 2141.02.1.). “Distilling an invention down to the ‘gist’ or ‘thrust’ of an invention disregards the

requirement of analyzing the subject matter 'as a whole.'" (MPEP sec 2141.02.II., citing *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983)) All the words of a claim have to be considered in assessing the patentability of this claim over the prior art. "All words in a claim must be considered in judging the patentability of that claim against the prior art." (Id., citing *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970))

Claim 20 recites the following claim language: (1) a plurality of display modules that are *interlockable*; (2) *each* display module comprising connectors; (3) the connectors to receive power from and/or provide power to an adjacent *display module*; and, (4) the receptors receptive to *connectors* of an adjacent display module. This claim language of claim 20 is at least substantially similar to that of claim 1 that has been discussed above. Furthermore, in rejecting claim 20 over Ezumi in view of Asano, the Examiner has relied upon Ezumi in the same way in rejecting claim 1 over Ezumi alone. Insofar as Ezumi does not teach, disclose, or suggest the claim language for which it is being relied upon in the rejection of claim 20 over Ezumi in view of Asano, as has been discussed above in relation to claim 1, then Ezumi in view of Asano does not teach, disclose, or suggest all the claim language of claim 20.¹ This is because *all* the words of claim 20 have to be considered in judging its patentability against the prior art.

¹ Applicant parenthetically notes that the references are not being attacked individually herein. Rather, Applicant's argument is that the proffered combination of references does not teach, disclose, or suggest all the claim language of claim 20, such that the references in combination do not render claim 20 nonobvious. In arguing why the combination of references does not teach, disclose, or suggest all the claim language of claim 20, Applicant focuses on a particular reference, Ezumi, in the same way that the Examiner has done. Insofar as this particular reference does not teach, disclose, or suggest the aspects of claim 20 as relied upon by the Examiner, the combination of references as a whole cannot teach, disclose, or suggest claim 20 in its entirety.

Claims 27-37

Claim 27 is an independent claim, from which claims 28-37 ultimately depend. Claims 27-37 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi in view of Asano. Applicant submits that as originally presented, claim 27 is patentable over Ezumi in view of Asano. Therefore, claims 28-37 are patentable at least because they depend from a patentable base independent claim, claim 27.

Claim 27 recites the following claim language: (1) the display module being *interlockable* with an adjacent display module; (2) the connectors to receive power from and/or provide power to an adjacent *display module*; and, (3) the receptors receptive to *connectors* of an adjacent display module. This claim language of claim 27 is at least substantially similar to that of claim 1 that has been discussed above. Furthermore, in rejecting claim 27 over Ezumi in view of Asano, the Examiner has relied upon Ezumi in the same way in rejecting claim 1 over Ezumi alone. Therefore, insofar as Ezumi does not teach, disclose, or suggest the claim language for which it is being relied upon in the rejection of claim 27 over Ezumi in view of Asano, as has been discussed above in relation to claim 1, then Ezumi in view of Asano does not teach, disclose, or suggest all the claim language of claim 27. This is because *all* the words of claim 27 have to be considered in judging its patentability against the prior art.

Claims 38-50

Claim 38 is an independent claim, from which claims 39-50 ultimately depend. Claims 38-50 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi in view of Asano. Applicant submits that as originally presented, claim 38 is patentable over Ezumi in view of Asano. Therefore, claims 39-50 are patentable at least because they depend from a patentable base independent claim, claim 28.

Claim 38 recites the following claim language: (1) a display having a plurality of *interlockable* display modules; and, (2) the display modules connectable to one another by connectors to distribute power *among the display modules*. This claim language of claim 38 is at least substantially similar to that of claim 1 that has been discussed above. Furthermore, in rejecting claim 38 over Ezumi in view of Asano, the Examiner has relied upon Ezumi in the same way in rejecting claim 1 over Ezumi alone. Therefore, insofar as Ezumi does not teach, disclose, or suggest the claim language for which it is being relied upon in the rejection of claim 38 over Ezumi in view of Asano, as has been discussed above in relation to claim 1, then Ezumi in view of Asano does not teach, disclose, or suggest all the claim language of claim 38. This is because *all* the words of claim 38 have to be considered in judging its patentability against the prior art.

Claim 51

Claim 51 is an independent claim that has been rejected as being anticipated under 35 USC 102(e) by Ezumi. Applicant respectfully submits that as originally presented, claim 51 is patentable over Ezumi. Claim 51 recites the following claim language: *interlocking* means. This claim language of claim 51 is at least substantially similar to the “interlockable” claim language of claim 1. Therefore, claim 51 is patentable over Ezumi for at least the same reasons that claim 1 is patentable over Ezumi, as has been discussed above in relation to claim 1.

Claims 52-57

Claim 52 is an independent claim, from which claims 53-57 ultimately depend. Claim 52 has been rejected under 35 USC 102(e) as being anticipated by Ezumi. Claims 53-57 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi in view of Asano. Applicant submits that as originally presented, claim 52 is patentable over Ezumi. Therefore, claims 53-57 are patentable at least because they depend from a patentable base independent claim, claim 52.

Claim 52 recites the following claim language: a plurality of *interlockable* display modules. This claim language of claim 52 is at least substantially similar to that of claim 1. Therefore, claim 52 is patentable over Ezumi for at least the same reasons that claim 1 is patentable over Ezumi, as has been discussed above in relation to claim 1.

Claims 58-60

Claim 58 is an independent claim, from which claims 59 and 60 ultimately depend. Claims 58-60 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi in view of Asano. Applicant submits that as originally presented, claim 58 is patentable over Ezumi in view of Asano. Therefore, claims 59 and 60 are patentable at least because they depend from a patentable base independent claim, claim 58.

Claim 58 recites the following claim language: (1) a plurality of *interlockable* display modules; (2) *each* display module comprising connectors; (3) the connectors to receive power from and/or provide power to adjacent *display modules*; and, (4) the receptors receptive to *connectors* of adjacent display modules. This claim language of claim 58 is at least substantially similar to that of claim 1 that has been discussed above. Furthermore, in rejecting claim 58 over Ezumi in view of Asano, the Examiner has relied upon Ezumi in the same way in rejecting claim 1 over Ezumi alone. Therefore, insofar as Ezumi does not teach, disclose, or suggest the claim language for which it is being relied upon in the rejection of claim 58 over Ezumi in view of Asano, as has been discussed above in relation to claim 1, then Ezumi in view of Asano does not teach, disclose, or suggest all the claim language of claim 58. This is because *all* the words of claim 58 have to be considered in judging its patentability against the prior art.

Conclusion

Applicants have made a diligent effort to place the pending claims in condition for allowance, and request that they so be allowed. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Mike Dryja, Applicants' Attorney, at 425-427-5094, so that such issues may be resolved as expeditiously as possible. For these reasons, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,



Michael A. Dryja, Reg. No. 39,662
Attorney/Agent for Applicant(s)

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Law Offices of Michael Dryja
1474 N Cooper Rd #105-248
Gilbert, AZ 85233
tel: 425-427-5094
fax: 425-563-2098